

Privacy Policy

Shore Partners Pty Limited ABN 40 002 621 445 trading as Shore Partners Neutral Bay recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This Privacy Policy sets out how we collect and manage personal information and the steps we take to protect it.

Shore Partners respects your rights to privacy under the Privacy Act 1988 to ensure we handle personal information in accordance with the Act and complies with all of the Act's requirements in respect of the collection, management and disclosure of personal information, including the Australian Privacy Principles.

This Privacy Policy is intended to inform you about the following:

- What type of personal information Shore Partners collect
- How Shore Partners collects your personal information
- The purposes for which Shore Partners uses and discloses that information
- How Shore Partners maintains and keeps the information secure
- How you may access, correct or update any personal information that Shore Partners holds about you, and
- The process for complaining about a breach of privacy

What is your personal information?

When used in this privacy policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect and hold?

Shore Partners may collect any of the following information about you if you are a current or prospective vendor, purchaser or landlord of real estate:

- Contact details (including, name, address, telephone number and email address)

- Personal information (age or birth date, profession/occupation/job title)
- Driver's licence number
- Property ownership details including details of properties sold or acquired, current holdings
- Desired property ownership details, and
- Any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise and information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

If you are a current or prospective tenant for a rental property, Shore Partners may collect the following additional information from you:

- Contact details (including, name, address, telephone number and email address)
- Personal information (age or birth date, profession/occupation/job title)
- Driver's licence, passport and/or other forms of identification
- Employment details such as your employment status, employer, salary, length of employment
- Other sources of income, and
- Personal and financial referees whom we may contact about your application.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

How do we collect your personal information?

Shore Partners collects your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in various ways, including through when you write to or email us, when you access and use our website and during conversations between you and our representatives, by contracting with us, when you enter competitions, promotions or requesting information or material from us, completing surveys or providing feedback.

Shore Partners may also collect information about you from the following third-party sources:

- Various databases in the public domain such as Telstra White Pages, Land Titles searches or other property databases
- Your representatives (lawyers, accountants and financial advisers)

- Your employer
- Law enforcement agencies and other government entities
- Referrals and recommendations from existing clients of Shore Partners and
- Publicly available sources of information or any other organisation where you have given your consent.

In some cases, we may also collect your information through the use of cookies. When you access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognize your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

Can I be anonymous when I deal with Shore Partners?

To some extent you can preserve your anonymity when you deal with Shore Partners. You can browse our website without providing any personal information, you can access our real-estate advertising in various publications and in some instances whereby the auction is held on the street and you do not intend to bid, and you may not be requested to provide personal information.

What happens if we can’t collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- We may not be able to provide the requested products or services to you, either to the same standard or at all
- We may not be able to provide you with information about products and services that you may want or
- We may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful

For what purposes do we collect, hold, use and disclose your personal information?

Shore Partners collects personal information so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- To provide products and services to you and to send communications requested by you
- To answer enquiries and provide information or advice about existing and new products or services
- To provide you with access to protected areas of our website
- To assess the performance of the website and to improve the operation of the website
- To conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties
- For the administrative, marketing (including direct marketing), planning, product or service development, quality control, survey and research purposes of Shore Partners, its related bodies corporate, contractors, franchisees, franchisees' real estate agents or service providers
- For tenancy verification and identity purposes
- To provide your updated personal information to our related bodies corporate, contractors or service providers
- To update our records and keep your contact details up to date
- To process and respond to any complaint made by you, and
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority of any country (or political subdivision of a country).

Shore Partners will not share, sell, rent or disclosed personal information other than as described in this Privacy Policy.

To whom do we disclose personal information?

We may disclose your Personal Information to Shore Partners employees and our contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you to

suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and to any organisation for any authorised purpose with your express consent.

There are some instances when Shore Partners need to provide your Personal Information to third parties. Shore Partners may be bound by law to provide your details to government-related bodies.

Sometimes Shore Partners may need to outsource some of our administrative and other property-related functions to external organisations such as advertising agencies, signwriters, building and garden maintenance contractors or consultants such as accountants, lawyers, surveyors and other advisors. Other third parties may include web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and other business advisors and consultants. Most of the above organisations are bound by express or implied confidentiality obligations to Shore Partners.

Shore Partners does not sell your personal details to other organisations. We may however use the information about you to assist us with internal marketing and research.

We may disclose Personal Information to our related bodies corporate and third-party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your Personal Information do not breach the privacy obligations relating to your Personal Information.

We may disclose your Personal Information to entities located outside of Australia, including our data hosting and other IT service providers, who may pass information to secondary data hosting providers located outside of Australia.

Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that

method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). Shore Partners may charge you a reasonable fee to cover its administrative and other reasonable costs in providing the information to you. Shore Partners will not charge for simply making the request and will not charge for making any corrections to your personal information.

Shore Partners may not be able to provide access to information in some situations, including:

- Where in Shore Partners opinion providing your access may create a serious threat to the life or health of any individual or may be an unreasonable intrusion into the privacy of another individual
- Where your request for access is, in Shore Partners frivolous or vexatious, or
- Where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of law, or denying access is specifically authorised by law

To obtain access to your personal information:

- You will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected, and
- Shore Partners requests that you be reasonably specific about the information you require.

Alternatively, if you would like to access personal information held about you by the NTD, please contact the NTD on the contact details set out above.

If you believe that the personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Shore Partners will endeavour to respond to your request to access or correct your personal information within 30 days from your request. If Shore Partners refuse your request to access or correct your personal information, Shore Partners will provide you with written reasons for the refusal and details of complaint mechanisms. Shore Partners will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of Shore Partners.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will deal with the complaint in accordance with our then current Complaints Handling Procedure.

At all times, privacy complaints:

- Will be treated seriously
- Will be dealt with promptly
- Will be dealt with in a confidential manner, and
- Will not affect your existing obligations or affect the commercial arrangements between you and Shore Partners

Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our related bodies corporate and third-party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- Our related bodies corporate, located in foreign countries including the United States of America, New Zealand, Hong Kong, China and Singapore, and
- Other third parties located in various foreign countries

Security

Shore Partners will take reasonable steps to ensure information Shore Partners collects, uses or discloses is stored in a secure environment that is accessed only by persons authorised by Shore Partners so as to prevent interference, misuse, loss, unauthorised access, modification or disclosure. If the personal information is no longer needed for any purpose, Shore Partners will take reasonable steps to destroy or permanently de-identify the personal information. Shore Partners endeavours to provide a secure environment and a reliable system but you should be aware that there are inherent risks associated with the electronic storage and transmission of information (particularly via the Internet) which cannot be guaranteed to be 100% secure.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing you about their own privacy practices.

Addressing complaints or concerns

If you have any questions about our privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Privacy Officer
PO Box 1896 Neutral Bay NSW 2089

Email: mac@shorepartners.com.au

What if you are unable to resolve my complaint or concern?

If we are unable to resolve your complaint within this time, or you are unhappy with the outcome, you may refer your complaint to the Australian Information Commissioner. The Australian Information Commissioner can be contacted at the below details:

The Office of the Australian Information Commissioner
GPO Box 5218, Sydney NSW 1042
Phone: 1300 363 992
E-mail: enquiries@oaic.gov.au
TTY:133 677 then ask for 1300 363 992

Changes to our Privacy Policy

We may change this Privacy Policy from time to time and any updates will be posted on our websites. This Privacy Policy was last updated on 27 July 2022.